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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

PORLTAND GENERAL ELECTRIC  
COMPANY, an Oregon corporation,

Plaintiff,

v.

STATE OF OREGON, by and through  
THE OREGON DEPARTMENT OF STATE  
LANDS, and +/- FIVE ACRES OF  
UNIMPROVED LAND ALONG THE  
WILLAMETTE RIVER NEAR WEST  
LINN, OREGON,

Defendant.

Case No.: 3:22-cv-00533-SI

UNOPPOSED MOTION FOR EXTENSION  
OF TIME

Under Fed. R. Civ. P. 6(b), plaintiff Portland General Electric Company (“PGE”) respectfully asks this Court for an extension of the deadline to file PGE’s response to Proposed Intervenor-Defendant Confederated Tribes of the Grand Ronde Community of Oregon’s Motion to Intervene as Defendant and Memorandum in Support [Dkt. 7]. Under LR 7-1(a), Counsel for PGE conferred with counsel for the State of Oregon and with counsel for the Confederated

Tribes of the Grand Ronde Community (“Grand Ronde”) about the extension of time sought in this motion and both confirmed that this motion is unopposed.

Grand Ronde filed its respective motion on May 19, 2022. Under LR 7-1(e), PGE’s response to the motion is due on June 2, 2022. PGE respectfully requests an extension of this deadline to June 13, 2022. Due to the unavailability of a PGE executive who is currently out of the country, PGE does not have the necessary information required to respond to Grand Ronde’s motion. This motion is made in good faith and is not made solely for the purposes of delay. No trial date has been set for this case and granting the relief sought herein will neither affect any deadlines set by this Court nor unduly delay the resolution of the matter.

Dated: May 31, 2022.

BALL JANIK LLP

s/ Stephen T. Janik

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